

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

JASON A. RICHER,  
Plaintiff

v.

JASON PARMELEE as the Finance Director of  
THE TOWN OF NORTH SMITHFIELD,  
TOWN OF NORTH SMITHFIELD, and  
STEVEN E. REYNOLDS in his official  
capacity as Chief of the NORTH SMITHFIELD  
POLICE DEPARTMENT  
Defendants

C.A. No. 15-162

PLAINTIFF'S MOTION TO AMEND THE COMPLAINT

Pursuant to F.R.C.P. 15(a)(2), Plaintiff hereby moves to amend the complaint in the form attached as a Second Amended Verified Complaint. Plaintiff relies upon the accompanying memorandum in support of this motion.

Respectfully submitted,  
**JASON RICHER**  
By his attorneys,

/s/ Thomas W. Lyons  
Thomas W. Lyons #2946  
Rhiannon S. Huffman #8642  
RHODE ISLAND AFFILIATE,  
AMERICAN CIVIL LIBERTIES UNION  
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**CERTIFICATION**

I hereby certify that on January 6, 2016 a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system and served by email on Marc DeSisto, Esq., attorney for defendants. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons